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## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	No. 4:23-cr-00578-AGF
v.	)	
	)	
CONNIE BOBO,	)	
	)	
Defendant.	)	

## **UNOPPOSED MOTION TO CONTINUE TRIAL SETTING**

The United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Derek J. Wiseman, Assistant United States Attorney for said District, files this Unopposed Motion to Continue the Trial Setting from September 22, 2025, to October 20, 2025. In support, the United States provides the following:

- 1. On October 25, 2023, the Grand Jury for the Eastern District of Missouri returned an Indictment charged Defendant with three counts of wire fraud, three counts of aggravated identity theft, and two counts of obstruction of an official proceeding. *See* Doc. 1. New counsel for the defendant entered their firm's appearance on October 3, 2024. *See* Doc. 67.
- 2. On January 2, 2025, this Court granted Defendant's motion to continue the trial date, and the trial setting was then reset to May 5, 2025. *See.* Doc. 76.
- 3. On April 18, 2025, this Court reset the trial date to September 22, 2025, after granting another motion to continue from the defendant. *See* Doc. 90.
- 4. Undersigned counsel has an unavoidable scheduling conflict with the current trial setting. Therefore, under 18 U.S.C. § 3161(h)(7), the ends of justice served by the requested continuance outweigh the best interest of the public and the defendant in a speedy trial.

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5. Undersigned counsel discussed this continuance request with counsel for Defendant, who has no objection to the continuance of the trial date.

WHEREFORE, The United States respectfully requests the Court to reset Defendant Connie Bobo's trial for October 20, 2025.

Respectfully submitted, SAYLER A. FLEMING United States Attorney

/s/ Derek J. Wiseman
DEREK J. WISEMAN #67257MO
Assistant United States Attorney

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of this document was filed with the Court's electronic file management system for service upon all parties of record on May 5, 2025.

/s/ Derek J. Wiseman
DEREK J. WISEMAN #67257MO
Assistant United States Attorney